

SABRINA P. SHROFF

ATTORNEY AT LAW

80 BROAD STREET, 19TH FLOOR
NEW YORK, NEW YORK 10007
TELEPHONE: (646) 763-1490

March 11, 2024

Hon. Joan M. Azrack
Judge, United States District Court
Eastern District of New York
920 Federal Plaza
Central Islip, New York 11722Re: *United States v. Arevalo-Chavez*, 22 Cr. 429 (JMA)

Dear Judge Azrack,

I write regarding my absence in Court today. I apologize for not having appeared. I have been at trial (the verdict came in on Friday, March 8, 2024) for the last three weeks on the case of *United States v. Juan Orlando Hernandez Alvarado*, 15 Cr. 379 (PKC). I was the only lawyer on the trial case with a security clearance and had to assume a larger role at trial than expected as the [REDACTED]. The defendant testified on his own behalf and his testimony implicated the Classified Information Procedures Act. [REDACTED]

[REDACTED] None of this is an excuse for my absence today and I do apologize for not having informed the Court earlier of the situation.

I have conferred with my co-counsel and the government who informs me that they “suggested an earlier date in case [my] client wanted to raise any medical issues and/or request transfer to FDC Philadelphia.” As I do not have those issues to raise at this time, and because the government has “provided voluminous discovery to date and will be providing additional items soon” (email from government counsel dated March 11, 2024), which I need time to review with him, I ask the Court to allow my client and I to appear on the date set for all defendants in this case which is June 13, 2024. My client agrees to an exclusion of time under the Speedy Trial Act.

Finally, it would be a hardship on my client to travel to Central Islip from the MDC solely to appear at a status conference. I believe his interest would be best served if the Court would allow us to appear with all defendants on June 13, 2024 at 10:30 a.m. as my client does not have any immediate issues to raise with the Court.

I thank the Court for its time and consideration.

Respectfully submitted,

/s/Sabrina P. Shroff
Counsel to Vladmir Antonio Arevalo-Chavez

Cc: All Counsel (by ECF)